

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA**

PUBLIC INTEREST LEGAL FOUNDATION, INC.

Plaintiff,

HOWARD M KNAPP, in his official capacity as
Executive Director of the South Carolina
Election Commission,

Defendant.

Case No. 3:24-1276-JFA

PLAINTIFF’S ANSWERS TO LOCAL RULE 26.01 INTERROGATORIES

Plaintiff Public Interest Legal Foundation (the “Foundation”), by its attorneys, hereby provides the following answers to the Court’s Rule 26.01 Interrogatories:

- A. State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

ANSWER: None

- B. As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER: Non-jury. Only declaratory and equitable relief is sought.

- C. State whether the party submitting these responses is a publicly owned company and separately identify (1) any parent corporation and any publicly held corporation owning ten percent (10%) or more of the party’s stock; (2) each publicly owned company of which it is a parent; and (3) each publicly owned company in which the party owns ten percent (10%) or more of the outstanding shares.

ANSWER: Plaintiff is not a publicly owned company and is a non-profit 501(C)(3) organization.

- D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). *See* Local Civ. Rule 3.01 (D.S.C.).

ANSWER: Defendant Knapp is sued in his official capacity only as the Executive Director of the South Carolina Elections Commission, located within the district where a substantial part of the events or omissions giving rise to the claim occurred.

- E. Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER: No

Dated: March 18, 2024

For the Plaintiff Public Interest Legal Foundation
s/ Richard L. Bolen
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**Application for admission forthcoming

Attorneys for Plaintiff Public Interest Legal Foundation